



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 31, 2022

BY ECF AND EMAIL

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: **United States v. Stefan Gillier**, 11 Cr. 409 (PAE)

Dear Judge Engelmayer:

At the January 25, 2022 conference in this case, the Court scheduled trial for July 11, 2022; set the final pretrial conference for July 5, 2022; and directed the parties to submit a proposed schedule for pretrial filings. The parties jointly and respectfully propose the following schedule:

- **June 7, 2022:** The Government provides notice pursuant to Rule 404(b).¹
- **June 14, 2022:** The Government produces § 3500 material and *Giglio* (identified as of that date for both), a draft witness list, a draft exhibit list, and exhibits (identified as of that date).
- **June 16, 2022:** The defense produces Rule 26.2 material (identified as of that date), a draft witness list, a draft exhibit list, and exhibits (identified as of that date), including both (a) any non-impeachment exhibits to be offered through Government witnesses or otherwise during the Government's case, and (b) any exhibits to be offered in the defense case.
- **June 22, 2022:** Both parties' motions *in limine*, requests to charge, proposed voir dire, and proposed verdict forms are due.
- **June 28, 2022:** Both parties' responses to each other's motions *in limine* are due.
- **July 5, 2022:** Final Pretrial Conference.
- **July 11, 2022:** Trial begins.

¹ The Government reserves the right, consistent with Rule 404(b), to provide reasonable, supplemental notice(s), as well.

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The Court's consideration of this request is appreciated.

Respectfully submitted,

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cc: Lee Ginsberg, Esq. (via ECF)
Nadjia Limani, Esq. (via ECF)

Granted.
SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge
2/1/2022